

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

L2 MOBILE TECHNOLOGIES LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:21-cv-358-ADA

JURY TRIAL DEMANDED

**DECLARATION OF ANDREW ROPE IN SUPPORT OF DEFENDANT GOOGLE
LLC'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

I, Andrew Rope, declare and state as follows:

1. I am a Senior Legal Project Manager on the Discovery Legal team at Google LLC ("Google"). I have been a Google employee since 2018. My office is in [REDACTED], California.

2. I provide this declaration in support of Google's Motion to Transfer Venue To The Northern District of California Under 28 U.S.C. § 1404(a), which seeks to transfer the above-captioned action filed by L2 Mobile Technologies LLC ("L2MT") on April 9, 2021. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to the information contained herein.

3. Google's Mountain View headquarters, which includes offices in neighboring Sunnyvale (collectively referred to as "Mountain View"), is the strategic center of Google's business. On April 9, 2021, the Mountain View headquarters employed approximately [REDACTED]

employees, which is approximately [REDACTED] of Google's U.S. employees. As of April 9, 2021, Google also had approximately [REDACTED] other employees in offices in San Francisco, California and other smaller offices also within the Northern District of California (the "NDCA"). As of April 9, 2021, approximately [REDACTED] of Google's [REDACTED] total U.S. employees, including engineers, product managers, marketers, executives, and staff were employed out of Google's offices located in the NDCA.

4. I understand that L2MT has accused certain Google Pixel series smartphones ("Pixel Products") that comply with the 3G and/or with both the 3G and 4G wireless communications standards.

5. Based on my knowledge and investigation, the Google employees who have knowledge about the technical, financial, and marketing aspects of the accused Pixel Products are based in the San Francisco Bay Area. In particular, the engineers and groups with knowledge relating to the accused 3G and 4G standard in the accused Pixel Products are based in or near Mountain View.

6. Based on my knowledge and investigation, Erik Stauffer is a hardware engineer working at Google. I understand that Mr. Stauffer [REDACTED] and works at Google's Mountain View headquarters. I understand that Mr. Stauffer has knowledge regarding the technical aspects of the accused Pixel Products, including their implementation of 3G and 4G standards.

7. Based on my knowledge and investigation, Jibing Wang is a hardware engineer working at Google. I understand that Mr. Wang [REDACTED] and works at Google's Mountain View headquarters. I understand that Mr. Wang has knowledge regarding the technical aspects of the accused Pixel Products, including their implementation of 3G and 4G standards.

8. Based on my knowledge and investigation, the marketing efforts for the accused Pixel Products are also managed by employees located at Google's Mountain View headquarters.

9. Based on my knowledge and investigation, Abhijit Ravi is Google's Head of Product Marketing for Pixel Products. I understand that Mr. Ravi [REDACTED] and works at Google's Mountain View headquarters. I understand that Mr. Ravi has knowledge regarding Google's marketing, promotion, and business information for the accused Pixel Products.

10. Based on my knowledge and investigation, Nick Yoswa is a senior financial analyst in the Pixel business unit working at Google. I understand that Mr. Yoswa [REDACTED] and works at Google's Mountain View headquarters. I understand that Mr. Yoswa has knowledge regarding Google's financial data and statements, accounting, and record-keeping related to the accused Pixel Products.

11. Based on my knowledge and investigation, James Maccoun is patent counsel working at Google. I understand that Mr. Maccoun [REDACTED] and works at Google's Mountain View headquarters. I understand that Mr. Maccoun has knowledge regarding Google's license agreements and licensing practices.

12. Based on my knowledge and investigation, Matthew Gubiotti is Senior Litigation Counsel working at Google. I understand that Mr. Gubiotti [REDACTED] and works at Google's San Francisco office in the NDCA. I understand that Mr. Gubiotti has knowledge regarding Google's pre-suit discussions with L2MT.

13. Based on my knowledge and investigation, George Bonanto is patent counsel working at Google. I understand that Mr. Bonanto works at Google's Boulder, Colorado office. I understand that Mr. Bonanto has knowledge regarding Google's pre-suit discussions with L2MT.

14. Based on my knowledge and investigation, Brad Murray is a technical advisor working at Google. I understand that Mr. Murray [REDACTED] and works at Google's Chicago, Illinois office. I understand that Mr. Murray has knowledge regarding Google's pre-suit discussions with L2MT.

15. Based on my knowledge and investigation, I am not aware of any Google employees with relevant technical, marketing, or financial knowledge regarding the accused Pixel Products who are based in the Western District of Texas, including in Google's offices in Austin, or anywhere else in Texas.

16. As a matter of Google practice, documents in Google's possession about its products and services are normally created and maintained by the employees working on those products and services. As discussed above, the employees with relevant knowledge of the accused features of the Pixel Products are located primarily in or around Mountain View, California, and no such employees are in the Western District of Texas.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on July 1, 2021, in [REDACTED].

DocuSigned by:

Andrew Pope

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Andrew Rope